

SPENCE LAW OFFICE, P.C.

55 LUMBER ROAD

SUITE 5

ROSLYN, NY 11576

TEL: 516-336-2060 FAX: 516-605-2084

July 18, 2022

BY ECF

Honorable Robert E. Grossman
United States Bankruptcy Judge
United States Bankruptcy Court
290 Federal Plaza
Central Islip, New York 11722

Re: ***Freeport Gate LLC***
Chapter 11
Case No. 22-71639 REG

Dear Judge Grossman:

I am proposed counsel for the above Subchapter V Debtor. This letter is provided in accordance with the Court's Order dated July 7, 2022 and pursuant to 11 U.S.C. § 1188(c) of the Bankruptcy Code. In regard to a consensual plan, the Debtor has thus far:

1. Engaged in discussions with the Subchapter V Trustee, Mr. Luckman, regarding details about this case including the prospects of a consensual plan;
2. Communicated with the Debtor's largest secured creditor regarding the possibility of a consensual plan and concessions which may be needed;
3. Prepared an application to be filed shortly for the engagement of an auctioneer to sell the Debtor's principal asset; and
4. Removed a pre-petition state court lawsuit from Supreme Court Nassau County to the Bankruptcy Court (Adv. Pro. No. 22-08055 reg). The case involves a \$120,000 contract deposit the Debtor seeks to recover as liquidated damages from a breaching buyer. The Debtor intends to utilize any recovery in this lawsuit to assist in funding its plan.

I am pleased to also report that the Debtor has filed its schedules and required statements (except for the statement pursuant to LBR 1007-4 which will be filed this week) and attended its Initial Debtor Interview.

Thank you for the Court's time and consideration.

Respectfully submitted,

/s/ Robert J. Spence

Robert J. Spence

Cc: Stan Yang, Esq. (By Email)
Gerard Luckman, Esq. (By Email)
All Creditors (By Email or First-Class Mail (if email is not available))